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13
14 UNITED STATES DISTRICT COURT
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 LOURDES VILLEGAS, individually on behalf) Case No. CV 12-00915 LHK
18 of herself and all other similarly situation,)
19 Plaintiff,) **STIPULATION REGARDING TIME FOR**
20 vs.) **DEFENDANT POINTROLL, INC. TO**
21) **RESPOND TO COMPLAINT AND**
22) **[PROPOSED] ORDER**
23)
24 GOOGLE, INC., a Delaware Corporation; and)
25 POINTROLL, INC., a Delaware Corporation,)
26)
27 Defendants.)
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1
2 Plaintiff Lourdes Villegas (“Villegas”) and Defendant PointRoll, Inc. (“PointRoll”)
3 (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as
4 follows:

5 WHEREAS, PointRoll was served with the complaint in this action on March 7, 2012;

6 WHEREAS, the Parties entered into a stipulation providing that PointRoll’s deadline to
7 respond to the Complaint should be extended until April 27, 2012 (the “Extension”);

8 WHEREAS, the Parties subsequently entered into a stipulation providing that “All
9 proceedings and deadlines in the above-captioned action are stayed until forty five (45) days after
10 the JPML rules on the MDL Motion or until further order of this Court or the MDL Transferee
11 Court” and “This stay shall encompass Google’s and PointRoll’s deadlines to answer, move to
12 dismiss, or otherwise respond to the Complaint” (the “Stay Stipulation”);

13 WHEREAS, the Parties intended that PointRoll’s deadline to respond to the Complaint
14 would be governed by the Stay Stipulation, rather than the Extension;

15 WHEREAS, on March 20, 2012, the Court entered an order, pursuant to the Stay Stipulation,
16 providing in part that “All proceedings and deadlines in the above-captioned action are stayed until
17 forty five (45) days after the JPML rules on the MDL Motion or until further order of this Court or
18 the MDL Transferee Court” and “This stay shall encompass Google’s and PointRoll’s deadlines to
19 answer, move to dismiss, or otherwise respond to the Complaint” (Dkt. No. 22, the “Stay Order”);

20 WHEREAS, later on March 20, 2012, the Court, pursuant to the Extension, entered an order
21 providing that PointRoll’s deadline to respond to the Complaint shall be extended until April 27,
22 2012 (Dkt. No. 23);

23 WHEREAS, the Parties wish to make clear that it was their intention that PointRoll’s
24 deadline to respond to the Complaint be governed by the Stay Order (as entered by the Court as Dkt.
25 No. 22), not the Extension (as entered by the Court as Dkt. No. 23);

26 NOW THEREFORE the Parties HEREBY STIPULATE AND AGREE that the date for
27 PointRoll to respond to the Complaint in this matter shall be governed by the Stay Order (Dkt. No.
28 22) and be stayed until forty five (45) days after the JPML rules on the MDL Motion or until further

1 order of this Court or the MDL Transferee Court.

2
3 Dated: April 2, 2012

STRANGE & CARPENTER

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5
6 By: /s/ Brian R. Strange

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16 Attorneys for Plaintiff Lourdes Villegas

17 Dated: April 2, 2012

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18
19
20 By: /s/ Carol Lynn Thompson

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16 Attorneys for Defendant PointRoll, Inc.

17 **FILER'S ATTESTATION**

18 Pursuant to General Order No. 45, Section X(B) regarding signatures, I, Carol Lynn
19 Thompson, attest that concurrence in the filing of this document has been obtained from Brian
20 Strange.

21 By: /s/ Carol Lynn Thompson
22 Carol Lynn Thompson
23
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28

1 **[PROPOSED] ORDER**

2 The above stipulation having been considered and good cause appearing therefore,

3 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

4 Dated: April 3, 2012

Lucy H. Koh

LUCY H. KOH

UNITED STATES DISTRICT JUDGE